

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RAYMUREZ CHRISTOPHER BROWN,

CA: 20-10192

Plaintiff,

HON. ROBERT A. CLELAND

-vs-

MAG. ELIZABETH A. STAFFORD

OFFICER JOSHUA SCAGLIONE;
OFFICER ROBERT SCHURIG;
OFFICER ANDREW TESCHENDORF;
OFFICER CALE FURNEY; and
OFFICER ANTHONY JAVONAVICH, in
their Individual Capacity, Jointly and
Severally,

Defendants.

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HARRINGTON, P.C.
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STIPULATED PROTECTIVE ORDER

THIS MATTER having come before this Honorable Court upon stipulation of the attorneys for Plaintiff and all Defendants, and the Court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED that the Response to Resistance Operations Policy of the City of Westland Police Department, which includes the Department's policy as to Taser use, will be produced. The documents produced shall be subject to the following conditions:

1. The documents subject to this Protective Order shall be used solely and exclusively for the purposes of the above-captioned lawsuit and can be used in any and all court filings, judicial proceedings, depositions, alternative dispute resolution proceedings, trial, and/or any other judicially-related proceedings.

2. The documents subject to this Protective Order shall not be used in or for any other case, proceeding, dispute, or for any commercial, business, or competitive purpose whatsoever.

3. The documents subject to this Protective Order may be reviewed by Plaintiff's attorneys, counsel for any Defendant, Plaintiff or defense counsels' staff, those individuals associated with the activities cited in subparagraph (1), and such experts and/or consultants as Plaintiff or defense counsel deem necessary for purposes of this litigation.

4. The documents provided pursuant to this Protective Order may be disclosed only to those individuals and/or entities identified in this Protective Order and must be used only by those individuals and/or entities identified in this Protective Order and must only be used for purposes of this litigation.

5. Before making any documents produced herein, or the information contained therein, available to any individual and/or entity identified in this Protective Order, a party shall obtain from that person or entity a written acknowledgment that he/she/it has been given a copy of this Order, has read it, and agrees to be bound by all of its terms.

IT IS FURTHER ORDERED that nothing in this Protective Order shall prevent a party from filing a Motion for Modification of the Protective Order or an in-camera review request once the discovery requested has been produced and reviewed.

IT IS FURTHER ORDERED that this Protective Order shall survive and remain in full force and effect until the entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation, unless otherwise ordered by the Court.

IT IS FURTHER ORDERED that the documents produced under the Protective Order do not constitute an admission or agreement that any such

document is admissible as evidence in this case. Determinations of evidence admissibility will be made by the Court in separate proceedings.

IT IS FURTHER ORDERED that the documents produced pursuant to this Protective Order shall be destroyed by Plaintiff and/or Defendants' counsel after final disposition (including all appeals) of the case except any documents attached to any pleadings or briefings filed with the court or deposition exhibits.

IT IS SO ORDERED.

Dated: February 8, 2022

s/Robert H. Cleland
HON. ROBERT A. CLELAND
U.S. DISTRICT COURT JUDGE

Stipulated and Agreed to by:

s/ Holly S. Battersby
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